

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)

In RE: David Kimberly Berkau, Jr. and Mary Elizabeth Berkau, Debtors.	CASE NO. 18-00598-RNO
~~~~~ Freedom Mortgage Corporation,  Movant,	Judge: Robert N. Opel, II  Chapter 7
v. David Kimberly Berkau, Jr. and Mary Elizabeth Berkau, Respondent,	
Steven M. Carr, Trustee.	

**AMENDED NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

*Freedom Mortgage Corporation has filed a Motion for Relief with the court to Lift the Automatic Stay to Permit Freedom Mortgage Corporation, to Foreclose on debtor's property located at 648 Sunset Drive, Hanover, PA 17331*

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **April 12, 2018**, you or your attorney must do all of the following:

(a) file an answer explaining your position at

United States Bankruptcy Court  
Middle District of Pennsylvania  
Ronald Regan Federal Building  
228 Walnut Street, Rm 320  
Harrisburg, PA 17101

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

**Lois M. Vitti, Esquire  
Vitti Law Group, Inc.  
333 Allegheny Avenue, Suite 303  
Oakmont, PA 15139  
412-281-1725**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **Honorable Robert N. Opel, II, 3rd & Walnut Sts, 3rd Fl. Courtroom, Harrisburg, PA 17101.**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (717) 901-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: March 29, 2018

/s/ Lois M. Vitti  
Lois M. Vitti, Esquire